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Lead Counsel for the Indirect-Purchaser Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

) Master File No. 3:07-cv-5944 SC

) MDL No. 1917

This Document Relates to:

Indirect-Purchaser Class Action

) **DECLARATION OF GERARD A.
DEVER IN SUPPORT OF**

) **INDIRECT PURCHASER PLAINTIFFS'
NOTICE OF MOTION AND MOTION
IN LIMINE NO. 14:**

) **TO LIMIT DEFENDANTS' DEPOSITION
DESIGNATIONS PRESENTED IN
PLAINTIFFS' CASE TO REASONABLE
CROSS AND TO EXCLUDE
UNRELATED DESIGNATIONS**

) Hearing Date: February 27, 2015

) Time: None set

) Courtroom: One, 17th Floor

) The Honorable Samuel Conti

1 I, Gerard A. Dever, hereby declare and state as follows:

2 1. I am a member of the law firm Fine, Kaplan and Black, R.P.C., counsel for the
3 Indirect Purchaser Plaintiffs in the above-captioned action currently pending in the U.S. District
4 Court for the Northern District of California. I am a member in good standing of the bar of the
5 Commonwealth of Pennsylvania and I am admitted *pro hac vice* to practice before this Court. I
6 submit this Declaration in support of Plaintiffs' Motion *in Limine* No. 14: to limit Defendants'
7 deposition designations presented in Plaintiffs' case to reasonable cross and to exclude unrelated
8 designations.

9 2. Attached hereto as **Exhibit A** is a true and correct copy of an excerpt of the
10 Transcript of Motion *In Limine* Conference in *In re Urethane Antitrust Litig.*, No. 04-1616 (D.
11 Kan.), with the relevant portions highlighted.

12 I declare under penalty of perjury under the laws of the United States that the foregoing is
13 true and correct.

14 Executed on February 13, 2015, in Philadelphia, Pennsylvania.

15
16 /s/ Gerard A. Dever

17 Gerard A. Dever

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